

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

2016 OCT 17 PM 12:28

CLERK  
AT BALTIMORE

BY \_\_\_\_\_ DEPUTY

Shaomin, Sui

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-against-

First advantage background service  
corp.

Equifax, Experian

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

Complaint for a Civil Case

Case No. JFM 16 CV 3454

*(to be filled in by the Clerk's Office)*

Jury Trial: ☐ Yes ☐ No  
*(check one)*

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

|                    |                                |
|--------------------|--------------------------------|
| Name               | <u>Shaomin Sui</u>             |
| Street Address     | <u>2903 Burrows Lane</u>       |
| City and County    | <u>Ellicott city Howard</u>    |
| State and Zip Code | <u>MD 21043</u>                |
| Telephone Number   | <u>240 751 8229</u>            |
| E-mail Address     | <u>Sui.shaomin@hotmail.com</u> |

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

|                              |   |
|------------------------------|---|
| Name                         | <u>First advantage background service corp.</u> |
| Job or Title<br>(if known)   | <u></u>   |
| Street Address               | <u>1 concourse parkway NE. suite 200</u>        |
| City and County              | <u>Atlanta</u>                                  |
| State and Zip Code           | <u>GA 30328</u>                                 |
| Telephone Number             | <u>800 845 6004</u>                             |
| E-mail Address<br>(if known) | <u></u>   |

Defendant No. 2

Name

Equifax

Job or Title

(if known)

Street Address

1550 peachtree street NW

City and County

Atlanta, Fulton County

State and Zip Code

GA 30309

Telephone Number

404 885 8000

E-mail Address

(if known)

Defendant No. 3

Name

experian

Job or Title

(if known)

Street Address

475 Anton Blvd

City and County

Costa Mesa, Orange County

State and Zip Code

CA 92626

Telephone Number

714 830 7000

E-mail Address

(if known)

Defendant No. 4

Name

Job or Title

(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

(if known)

*(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)*

Defendants.

b. 1). First advantage background <sup>service</sup> corp.

GA.

2). Equifax

GA

2) Experian

CA

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) Shaomin Sui, is a citizen of  
the State of (name) Maryland.

##### b. If the plaintiff is a corporation

The plaintiff, (name) ~~First Advantage background service corp.~~, is incorporated  
under the laws of the State of (name) ~~MD~~,  
and has its principal place of business in the State of (name)  
\_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) First advantage background service Corp., is incorporated under the laws of the State of (name) GA, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

see attached  
(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

100 Million  
First advantage background corp. makes me ~~be~~ that  
it is impossible to find a job. ~~is~~

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

During I was looking for a job, the employer asked First advantage background service corp. to check my background. The background check report that First advantage made stated that I was ~~was~~ ineligible for hire because social security verification problem. I sent a dispute to First advantage with copies of my SSN card and my Driver license. But they keep same decision. The report ~~to~~ made me lost my job.

Due to this wrong report, I will have same situation ~~when~~ when I go to other employers. The report that First advantage made will make me impossible to find a job.

see attached files

thanks.

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

1. it is impossible for me to find a job with this background check report
2. it is about my whole life and my families.
3. I am asking a 100 million or correct my report right away. (in 3 days)
4. ~~cost due to the case~~ any cost during the case.



**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

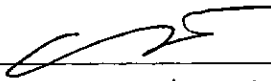
**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Oct. 17, 2016

Signature of Plaintiff

Printed Name of Plaintiff

  
Shaomin Sui

*(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)*

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

Email Address

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